

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

TEXAS ASS'N FOR MONEY SERVICES
BUSINESSES (TAMSB), *et al.*

Plaintiffs,

v.

PAM BONDI, in her official capacity as
Attorney General; SCOTT BESSENT, in his
official capacity as Secretary of the Treasury;
UNITED STATES DEPARTMENT OF THE
TREASURY; ANDREA GACKI, in her
official capacity as the Director of the
Financial Crimes Enforcement Network;
FINANCIAL CRIMES ENFORCEMENT
NETWORK,

Defendants.

Civil Action No. 25-cv-344

JOINT NOTICE

Counsel for the parties have conferred and hereby respectfully notify the Court of the following conferrals related to the schedule.

In accordance with the schedule set by the Court, Plaintiffs have disclosed any witnesses they intend to present at the scheduled hearing on the motion for a preliminary injunction, and Defendants have disclosed that they intend to rely on the administrative record and declaration evidence. *See* ECF Nos. 41, 43.

With that information, Counsel have conferred about the time needed to conduct and complete the hearing and have made best efforts to estimate the time required for a hearing. Plaintiffs estimate 3-4 hours of direct testimony, and Defendants 1.5-2.5 hours of total cross-examination.

Counsel for the parties would also like a chance to present oral argument on the motion, including opening and closing statements (i.e., both before and after the anticipated testimony). In order to ensure plenty of time to answer any questions from the Court, the parties estimate such argument will take no longer than 25 minutes for each side before testimony and 25 minutes for each side after testimony.

Accordingly, the parties anticipate that the hearing will take no more than approximately eight hours, probably less, and at the latest will conclude on May 13, 2025.

Dated May 8, 2025

Respectfully submitted

YAAKOV ROTH
Acting Assistant Attorney General

STEPHEN M. ELLIOTT
Assistant Director, Federal Programs Branch

/s/ Amy E. Powell
AMY E. POWELL
Senior Trial Counsel
United States Department of Justice
Civil Division, Federal Programs Branch
c/o U.S. Attorney's Office for EDNC
150 Fayetteville St, Suite 2100
Raleigh, NC 27601
Tel.: 919-856-4013
Email: amy.powell@usdoj.gov

Counsel for Defendants

Martin Golando
The Law Office of Martin Golando, PLLC
Texas Bar No. 24059153
2326 W. Magnolia
San Antonio, Texas 78201
Office: (210) 471-1185
Email: martin.golando@gmail.com

Roland Gutierrez
The Law Office of Roland Gutierrez
SBN #: 24007291
104 Babcock Ste. 107
San Antonio, Texas 78201
(210) 225-7114

Attorneys for Plaintiffs Texas Association for Money Services Businesses (TAMSB); Reynosa Casa De Cambio, Inc.; Nydia Regalado d/b/a Best Rate Exchange; Mario Regalado d/b/a Border International Services; Laredo Insurance Services, LLC; E.Mex. Financial Services, Inc.; R & C, Inc. d/b/a Temex Money Exchange; San Isidro Multi Services, Inc.; Cris Win Inc. d/b/a Brownsville Casa De Cambio; and Espro Investment LLC d/b/a Lonestar Money Exchange

/s/ Jeffrey Rowes
Jeffrey Rowes (TX Bar No. 24104956)*
Christen Mason Hebert (TX Bar No. 24099898)
INSTITUTE FOR JUSTICE
816 Congress Ave., Suite 970
Austin, TX 78701
(512) 480-5936
jrowes@ij.org
chebert@ij.org
Robert E. Johnson (DC Bar No. 1013390)*
INSTITUTE FOR JUSTICE
16781 Chagrin Blvd., Suite 256
Shaker Heights, OH 44120
(703) 682-9320
rjohnson@ij.org
Elizabeth L. Sanz (CA Bar No. 340538)*
INSTITUTE FOR JUSTICE
901 N. Glebe Road, Suite 900
Arlington, VA 22203
(703) 682-9320
bsanz@ij.org
Katrin Marquez (FL Bar No. 1024765)*
INSTITUTE FOR JUSTICE
2 South Biscayne Blvd., Suite 3180
Miami, FL 33131
(305) 721-1600
kmarquez@ij.org

* Admitted *Pro Hac Vice*
Attorney for Plaintiffs Arnoldo Gonzalez, Jr. and High Value, Inc.